

BOC affiliate.” [para. 21] As described above, in either case, the BOC can find ways to favor its affiliate.

VIII. CONCLUSION

34. While not completely effective in preventing or deterring the BOCs from acting on incentives to act anticompetitively, the separate subsidiary safeguard applied to the provision of interLATA facilities will reduce the potential for competitive harm in the interLATA market. The current interLATA market is functioning efficiently and providing substantial benefits to consumers. There is no reason to place this performance at risk by abandoning an important consumer and competitive safeguard. The BOCs should therefore not be permitted to provide in-region interLATA services or facilities to their affiliates.

I declare under the penalty of perjury that the foregoing is true and correct.

A. Daniel Kelley
April 24, 1997

A. Daniel Kelley

PROFESSIONAL EXPERIENCE:

Senior Vice President, Hatfield Associates, Boulder Colorado.

Conducting economic and applied policy analysis of domestic and international telecommunications public policy and business issues. Recent projects have included estimating costs of providing unbundled network elements and universal service and assessing the prospects for local telecommunications competition.

Director of Regulatory Policy, MCI Communications Corporation, 1984-1990.

Responsible for developing and implementing MCI's public policy positions on issues such as dominant carrier regulation, Open Network Architecture, accounting separations and Bell Operating Company line of business restrictions. Also managed an interdisciplinary group of economists, engineers and lawyers engaged in analyzing AT&T and local telephone company tariffs.

Senior Economist and Project Manager, ICF Incorporated, 1982-1984.

Telecommunications and antitrust projects included: forecasting long distance telephone rates; analysis of the competitive effects of AT&T's long distance rate structures; a study of optimal firm size for cellular radio markets; analysis of the FCC's Financial Interest and Syndication Rules, and competitive analysis of mergers and acquisitions in a variety of industries.

Senior Economist, Federal Communications Commission, 1979-1982.

Served as Special Assistant to the Chairman during 1980-1981. Advised the Chairman on proposed regulatory changes in the broadcasting, cable television and telephone industries; analyzed legislation and drafted Congressional testimony. Coordinated Bureau and Office efforts on major common carrier matters such as the Second Computer Inquiry and the Competitive Carrier Rulemaking. Also held Senior Economist positions in the Office of Plans and Policy and the Common Carrier Bureau.

Staff Economist, U.S. Department of Justice, 1972-1979.

Analyzed proposals for restructuring the Bell System as a member of the economic staff of U.S. v. AT&T; investigated the competitive effects of mergers and business practices in a wide variety of industries.

EDUCATION:

1976	Ph.D. in Economics	University of Oregon
1971	M.A. in Economics	University of Oregon
1969	B.A. in Economics	University of Colorado

PUBLICATIONS AND COMPLETED RESEARCH:

“Local Telecommunications Cost Modeling: Theory and Practice,” Telecommunications Policy Research Conference, Solomons, Md., (1996).

“A General Approach to Local Exchange Carrier Pricing and Interconnection Issues,” Telecommunications Policy Research Conference, Solomons, Md., (1992).

“Gigabit Networks: Is Access a Problem?” IEEE Gigabit Networking Workshop (1992).

“Advances in Network Technology” in Barry Cole, ed., After the Break-Up: Assessing the New Post-AT&T Divestiture Era (1991).

“Alternatives to Rate of Return Regulation: Deregulation or Reform?” in Alternatives to Rate Base Regulation in the Telecommunications Industry, NARUC (1988).

“AT&T Optional Calling Plans: Promotional or Predatory” in Harry M. Trebing, ed., Impact of Deregulation and Market Forces on Public Utilities: The Future Role of Regulation (1985).

“The Economics of Copyright Controversies in Communications” in Vincent Mosco, ed., Policy Research in Telecommunications (1984).

“Deregulation After Divestiture: The Effect of the AT&T Settlement on Competition,” FCC, OPP Working Paper No. 8 (1982).

“The Transition to Structural Telecommunications Regulation,” in Harry M. Trebing, ed., New Challenges for the 1980's (1982), with Charles D. Ferris.

“Social Objectives and Competition in Common Carrier Communications: Incompatible or Inseparable?” in Harry M. Trebing ed., Communications and Energy in Transition (1981), with Nina W. Cornell and Peter R. Greenhalgh.

“An Empirical Survey of Price Fixing Conspiracies,” Journal of Law and Economics (1974), with George A. Hay. Reprinted in Siegfried and Calvari, ed., Economic Analysis and Antitrust Law (1978) and the Journal of Reprints for Antitrust Law and Economics (1980).

TESTIMONY:

Federal Communications Commission, Application of Cellular Communications of Cincinnati, July 25, 1983 (with Robert J. Reynolds): Optimum firm size in the cellular radio market

Maryland Public Service Commission, Case No. 0450-Phase II, May 31, 1983: Access charge implementation issues

New York Public Service Commission, Case No. 28425, June 1983: Access charge implementation issues

Florida Public Service Commission, Docket No. 820537-TP, June 30, 1983, November 4, 1983, April 9, 1984, June 4, 1984, September 7, 1984, October 25, 1984 and August 15, 1985: Access charge implementation issues

Pennsylvania Public Utility Commission, Docket No. R-832, August 5, 1983: Pennsylvania Bell Rate Case

New Jersey Board of Public Utilities, Docket No. 83-11, February 20, 1984: Access charge implementation issues

New York Public Service Commission, Case 88-C-102, March 2, 1990: Alternative Operator Service Issues

California Public Service Commission, A.90-07-015, July 10, 1990: AT&T Deregulation

New York Public Service Commission, Case 28425, October 8, 1990: IntraLATA Dial 1 Competition

Massachusetts Department of Public Utilities, DPU 90-133, October 17, 1990: AT&T Deregulation

Georgia Public Service Commission, 3905-U, November 16, 1990: Incentive Regulation

California Public Service Commission, I-87-11-033, September 23, 1991: IntraLATA Competition

Georgia Public Service Commission, Docket No. 3987-U, January 31, 1992: Cross-Subsidy

Colorado Public Utilities Commission, Docket No. 92R-050T, August 24, 1992: Collocation

Connecticut Department of Public Utility Control, Docket No. 9106-10-06, September 25, 1992: Infrastructure

Maryland Public Service Commission, Case No. 8584, Phase II, July 21, 1995: Local Competition

Connecticut Department of Public Utility Control, Docket No. 95-06-17, September 8, 1995: Local Competition

Federal-State Joint Board on Universal Service, CC Docket No. 96-45, June 5, 1996: Cost of Universal Service

Colorado Public Utilities Commission, Docket No. 96A-287T, September 6, 1996: Arbitration

Michigan Public Service Commission, October 26, 1966: MCI Arbitration

CERTIFICATE OF SERVICE

I, Sylvia Chukwuocha, do hereby certify that a true copy of the foregoing "REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION CONCERNING EXPEDITED RECONSIDERATION OF SECTION 272(e)(4)" was served this 24th day of April, 1997, by hand-delivery or first-class mail, postage prepaid, upon each of the following persons:

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